

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

COPY

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LETICIA FRANCINE STIDHUM,

Plaintiff,

-against- CASE: 21-CV-07163

161-10 HILLSIDE AUTO AVE, LLC d/b/a HILLSIDE
AUTO OUTLET, and HILLSIDE AUTO MALL INC
d/b/a HILLSIDE AUTO MALL, ISHAQUE THANWALLA,
JORY BARON, RONALD M. BARON and ANDRIS GUZMAN,

Defendants.

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March 03, 2023

10:00 A.M.

VIRTUAL EXAMINATION BEFORE TRIAL of
JORY BARON, via Zoom, a Defendant herein,
held at the above-mentioned time and taken
before Lynn Luckman, a Notary Public and
Shorthand Reporter within and for the State
of New York.

SANDY SAUNDERS REPORTING
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A P P E A R A N C E S :

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FEDERAL STIPULATIONS

IT IS HEREBY STIPULATED AND AGREED by
and between counsel for the respective parties
hereto that all objections except as to the
form shall be reserved to the time of trial.

IT IS FURTHER STIPULATED AND AGREED
that the sealing and filing of this deposition
shall be hereby waived.

IT IS FURTHER STIPULATED AND AGREED
that this examination may be sworn to by the
witness being examined before a notary public
other than the notary public before whom
examination was begun examination was begun.

Jory Baron

BY THE COURT REPORTER:

The attorneys participating in this deposition acknowledge that I am not physically present in the deposition room and that I will be reporting this deposition remotely. They further acknowledge that, in lieu of an oath administered in person, I will administer the oath remotely. The parties and their counsel consent to this arrangement and waive any objections to this manner of reporting.

MS. TROY: I consent

MR. KATAEV: I

consent.

* * *

1 Jory Baron

2 MS. TROY: Mr. Kataev,
3 will you please have your
4 witness show his ID to me?

5 MR. KATAEV: Why is this
6 necessary?

7 MS. TROY: Because, it is
8 acceptable in a video
9 deposition; how else can I
10 know who it is?

11 MR. KATAEV: I'll
12 represent to you that it is
13 Jory Baron. Okay, please
14 proceed with your deposition.

15 MS. TROY: For the record,
16 Mr. Kataev wanted to switch
17 the witnesses, he switched
18 the witness that I had
19 requested for today. I asked
20 for the ID, and apparently
21 Mr. Kataev was advised that I
22 asked for his ID to be
23 presented today. I made a
24 request for him to bring his
25 ID to the deposition so that

1 Jory Baron

2 I could confirm who he is.

3 I'm going to make a demand

4 for Mr. Baron's driver's

5 license. We're going to mark

6 that deemed marked as

7 Plaintiff's Exhibit 13.

8 (Plaintiff's Exhibit 13 was

9 deemed marked for

10 identification)

11 MR. KATAEV: Please

12 follow-up in writing.

13 MS. TROY: Please have him

14 go to his car to get his ID.

15 MR. KATAEV: He is not

16 going to go to his car to get

17 his ID.

18 MS. TROY: I need to have

19 his ID to confirm who he is.

20 MR. KATAEV: I'll

21 represent it to you that he

22 is Jory Baron.

23 MS. TROY: Please show me

24 his ID.

25 MR. KATAEV: You can call

1 Jory Baron

2 the Court and let's get a
3 decision on this.

4 MS. TROY: All right. We
5 are going to do that.

6 MR. KATAEV: This is
7 harassment.

8 (A phone call was being made
9 to the Court at 10:03 a.m.)

10 MS. TROY: I will put it
11 on the speaker so that you
12 can all hear.

13 (A call was made at 10:06
14 a.m.)

15 And we are still waiting.
16 I've now put it on speaker
17 phone and I'm going to go
18 mute myself also. Let's go
19 off the record.

20 (A discussion was held off
21 the record)

22 ``MS. TROY: Good morning,
23 Your Honor. This is
24 plaintiff's counsel, Tiffany
25 Troy, and I'm appearing on

1 Jory Baron

2 behalf of the plaintiff,

3 Leticia Stidhum.

4 MR. KATAEV: Good morning,

5 Your Honor. My name is

6 Emanuel Kataev and I am with

7 the law firm of Milman Labuda

8 Law Group LLC, for the

9 defendants.

10 THE COURT: Good morning,

11 Ms. Troy and Mr. Kataev. Let

12 the record reflect that this

13 is not a scheduled

14 conference, and you have now

15 called at the start of a

16 deposition for the defendant

17 Jory Baron.

18 Ms. Troy, I was told by my

19 law clerk, and I want to make

20 the record clear, I got the

21 reason for the call that Mr.

22 Kataev would not have his

23 witness produce any

24 identification; is that

25 correct?

1 Jory Baron

2 MS. TROY: Yes, Your
3 Honor.

4 THE COURT: Mr. Kataev,
5 why won't Mr. Baron produce
6 his ID?

7 MR. KATAEV: Good morning,
8 Your Honor. The reason why
9 Mr. Baron, is not giving his
10 ID is because I've made a
11 representation to the
12 plaintiff that this is in
13 fact Jory Baron. There is no
14 issue of mistaken identity or
15 --

16 THE COURT: Why won't he
17 produce his ID? I'm asking
18 you the question, and he does
19 and Ms. Troy does not have to
20 take your representation.
21 Why won't he produce some ID?

22 MR. KATAEV: I'm objecting
23 to the ID, I have authority
24 on my objection that she has
25 no right to --

1 Jory Baron

2 THE COURT: I am
3 overruling your objection,
4 Mr. Kataev.

5 MR. KATAEV: Judge --

6 THE COURT: Excuse me,
7 sir. Please don't interrupt
8 me. If we have to do this
9 in-person we will do that.
10 There is a fight between the
11 lawyers at every turn in this
12 case and I will not tolerate
13 that. It is a waste of
14 everyone's time, and I've
15 been asked at the last minute
16 to effectuate a substitute,
17 Mr. Kataev, this morning and
18 I granted that wish to you as
19 a courtesy to you even though
20 it was objected to.

21 I am now telling you Mr.
22 Kataev, that he should
23 produce some ID to show that
24 he is Jory Baron. That is my
25 ruling, do you understand?

1 Jory Baron

2 MR. KATAEV: I understand
3 the ruling, but I would still
4 like to make a record about
5 my objection.

6 THE COURT: Again, sir,
7 this is a deposition and you
8 need to follow the Magistrate
9 Judge. Your witness does
10 have to show that he is who
11 he says he is. What is this
12 about?

13 MR. KATAEV: I will
14 explain to you if you'll
15 allow me to explain it, I am
16 entitled to have an
17 opportunity to be heard. This
18 is a case, a US District
19 Court case for the Northern
20 District of New York, CIV No.
21 1:15-CV-727.

22 Ms. Troy is asking for
23 the witness's identification,
24 and not withstanding that
25 there will be some numbers in

1 Jory Baron

2 the Court, notwithstanding,
3 refusal to compel the witness
4 to do so on the grounds of
5 privacy, and this is a Zoom
6 deposition.

7 THE COURT: Excuse me.

8 Excuse me, Mr. Kataev, my
9 time is valuable to me and I
10 am not telling him that he
11 has to produce his social
12 security number. He is the
13 defendant in this case and it
14 is being conducted by Zoom.
15 Everything has been done as a
16 courtesy to your client, he
17 can produce the ID. This is
18 the Order of the Court. Do
19 you want to go up on Appeal
20 on this issue or do you want
21 to accept the Ruling of the
22 court?

23 MR. KATAEV: I will accept
24 the Ruling. I have one final
25 thing to say that this

1 Jory Baron

2 deposition is being recorded
3 by Zoom, and I just want to
4 add that the ID can be
5 produced while the Zoom
6 deposition is not being
7 recorded.

8 THE COURT: I'm sorry, I
9 don't really understand what
10 the issue is. I understand
11 that people are entitled to
12 privacy about things like
13 social security numbers.
14 What is it that you are
15 trying to protect, Mr.
16 Kataev? This is a named
17 defendant, and Ms. Troy is
18 just trying to verify that he
19 is who he says he is. What
20 is it that you are really
21 trying to protect? I don't
22 understand at all.

23 MR. KATAEV: The driver's
24 license contains information
25 other than his identity, it

1 Jory Baron
2 contains his home address,
3 his driver's license number
4 and contains other
5 information. It is not
6 appropriate that the
7 plaintiff is entitled to
8 record that, and it's going
9 to be kept in plaintiff's
10 counsel's records and it is
11 required to produce. All I
12 ask is that the plaintiff
13 stop the recording, he will
14 give that identification and
15 represent who it is.

16 MS. TROY: Fine.

17 THE COURT: I will stay on
18 the line and I will ask for
19 the record in the Zoom
20 deposition to stop. I will
21 stay on the record while this
22 happens.

23 Ms. Troy, is that going to
24 be okay for you?

25 MS. TROY: Yes. In fact,

1 Jory Baron

2 even before the deposition,
3 we just asked for a scan of
4 the ID and Mr. Kataev said
5 that he wasn't going to
6 produce the ID without a
7 formal demand. Previously at
8 Friday's deposition last
9 week, at Mr. Thanwalla's
10 deposition, he agreed to
11 produce the ID later in the
12 day because the witness
13 supposedly left his ID in the
14 car. Today, he says the same
15 thing, which is that his
16 witness forgot his ID in the
17 car.

18 So, we are fine with the
19 production of the redacted
20 version of the ID which is
21 what we asked for all along.

22 MR. KATAEV: It's not, you
23 never asked for a redacted
24 version.

25 THE COURT: Stop, stop.

1 Jory Baron

2 She is entitled to verify
3 that the person she is
4 deposing is the person that
5 is identified and you don't
6 want plaintiff's counsel to
7 have his driver's license ID
8 number or to have his home
9 address. That is fine with
10 me.

11 But, it is her right to
12 verify that the witness is
13 who he says he is and she
14 doesn't have to take your
15 word for it. It's ridiculous
16 for you to be citing one
17 reported case as the reason
18 that you are making that
19 call.

20 Can I just state that I
21 have 5 other cases and this
22 is not a reason to be
23 contacting the Federal Court.
24 Mr. Kataev and Ms. Troy, I
25 understand that you have not

1 Jory Baron
2 had any goodwill between the
3 two of you but I will not
4 tolerate this level that
5 everything has to be brought
6 to the Court. I will tell
7 you that you are doing
8 injustice, you are both doing
9 injustice service to your
10 client. Again, Ms. Troy is
11 entitled to get some
12 verification of whoever the
13 witness was by virtue of the
14 ID, and as of last week, do
15 you understand me?

16 MR. KATAEV: I am claiming
17 a redacted version would be
18 fine, but it is -- I need the
19 authority for the appropriate
20 certification that she's
21 entitled to some form of ID.

22 THE COURT: I am her
23 authority and she's entitled
24 to that. Is that enough for
25 you?

1 Jory Baron

2 MR. KATAEV: Yes, Your
3 Honor.

4 THE COURT: Mr. Kataev, if
5 we have to do this on every
6 single point, Mr. Kataev, it
7 will not end up being useful
8 for you or for your client or
9 for Ms. Troy or her client.
10 We need to get through the
11 litigation here and you do
12 not need to raise every
13 single thing as another issue
14 to address the Court about;
15 do you understand?

16 MR. KATAEV: I understand,
17 Your Honor.

18 THE COURT: Mr. Kataev and
19 Ms. Troy, we stand by that the
20 fact that Mr. Baron is
21 directed to produce his ID.
22 You will then turn off the
23 recording right now and I
24 will stay on the line to make
25 sure that it doesn't become

1 Jory Baron

2 an issue.

3 MS. TROY: Recording

4 stopped, Your Honor.

5 MR. KATAEV: He has

6 already gone downstairs.

7 THE COURT: Well, now we

8 have to waste my time waiting

9 for him to come back to give

10 Ms. Troy his ID so that I

11 don't get interrupted again.

12 MR. KATAEV: I apologize,

13 Your Honor.

14 THE COURT: Ms. Troy and

15 Mr. Kataev, please get your

16 focus back on the case and

17 don't make it about both of

18 you. It will not be a

19 pleasant thing to have

20 lawyers at this pitch, do you

21 understand that?

22 MS. TROY: Yes, Your

23 Honor.

24 MR. KATAEV: Understood,

25 Your Honor.

1 Jory Baron

2 [Time noted is 10:23]

3 THE COURT: Ms. Troy is
4 being asked not to write down
5 the driver's ID number or the
6 home address. Ms. Troy, I
7 assume that you have no
8 problem with that?

9 MS. TROY: No, I don't
10 have a problem with that.

11 THE COURT: Thank you.

12 So, the case does not --
13 there is no reason for
14 someone to prove who they
15 were at a deposition because
16 it was about a social
17 security number.

18 I am convinced that Ms.
19 Troy has no bad intent and
20 she just wants to verify that
21 Mr. Baron is who he says he
22 is, whoever the other witness
23 is. I believe there will be
24 no further issue on this
25 case. Please make sure that

1 Jory Baron

2 your witness comes prepared

3 to show ID, okay?

4 MR. KATAEV: Your Honor, I

5 have to go to my office and

6 it will be one minute.

7 [Time noted: 10:32 a.m.]

8 MR. KATAEV: I'm going to

9 show the ID.

10 (Ms. Troy peruses.)

11 MS. TROY: That is

12 satisfactory.

13 THE COURT: Is that

14 satisfactory?

15 MS. TROY: Yes, it is.

16 THE COURT: I don't

17 believe there will be any

18 other matters that needs the

19 Court's intervention?

20 MS. TROY: No, Your Honor,

21 not from me.

22 MR. KATAEV: No, Your

23 Honor, not from --

24 MS. TROY: Not from the

25 plaintiff's side.

1 Jory Baron

2 MR. KATAEV: Nothing
3 further.

4 THE COURT: This matter is
5 now adjourned and I am going
6 to advise Ms. Troy and Mr.
7 Kataev to get on with the
8 deposition. Thank you very
9 much.

10 MS. TROY: Thank you, Your
11 Honor.

12 MR. KATAEV: Thank you.
13 (The recording has stopped.)

14 [Time noted: 10:34 a.m.]

15 MS. TROY: 10:35 the
16 recording is back on. Let's
17 get started.

18 [Time noted: 10:35 a.m.]

19 J-O-R-Y B-A-R-O-N, a Defendant herein,
20 after having been duly sworn by a Notary
21 Public of the State of New York, was
22 examined and testified as follows:

23

24 BY THE REPORTER:

25 Q. Please state your full name for

1 Jory Baron

2 the record.

3 A. Jory Baron.

4 Q. Please state your present
5 address for the record.

6 A. 21 Wayside Lane, Huntington, New
7 York 11743.

8 EXAMINATION BY

9 TIFFANY TROY:

10 Q. Good morning, Mr. Baron. My
11 name is Tiffany Troy and I represent the
12 plaintiff in this matter, Leticia Stidhum.
13 Before we get started, have you ever been
14 deposed before?

15 A. No.

16 Q. In that case, I'm going to
17 explain what a deposition is and lay down
18 some ground rules going forward; do you
19 understand?

20 A. Yes.

21 Q. First, this deposition is for me
22 to ask you questions and for you to answer
23 my questions about the subject matter of
24 this lawsuit. To be clear, this lawsuit is
25 about the pregnancy discrimination claims

1 Jory Baron

2 brought by Leticia Stidhum. There is also a
3 separate State Court Action that is about
4 the wage and hour claim, but we will be
5 addressing the pregnancy discrimination
6 claim today; do you understand?

7 A. Yes.

8 Q. Since the court reporter has to
9 take down everything that you say, I ask
10 that you give verbal responses; no shaking
11 or nodding of your head and no gestures; do
12 you understand that?

13 A. Yes.

14 Q. For the same reason, please
15 speak loudly and clearly when you answer a
16 question; do you understand?

17 A. Yes.

18 Q. The stenographer can only write
19 down one person speaking at a time.
20 Therefore, please do not start to answer one
21 of my questions before I stop asking it,
22 likewise I will not start a new question
23 until you have finished answering my last
24 question; do you understand?

25 A. Yes.

1 Jory Baron

2 Q. If you need to take a break, for
3 example to get a drink of water or to use
4 the restroom, please let me know and I will
5 call for a break; do you understand?

6 A. Yes.

7 Q. The only exception is that there
8 can be no break in between one of my
9 questions and your answer to that question;
10 you must finish answering my question before
11 you ask for a break; do you understand?

12 A. Yes.

13 Q. From time to time your attorney
14 may make objections to my questions.
15 Generally, however, unless your attorney
16 tells you not to respond you will still have
17 to respond; do you understand?

18 A. Yes.

19 Q. If you don't understand a
20 question, tell me and I will rephrase it so
21 that you can. If you don't hear a question,
22 tell me and I will repeat it so that you do;
23 do you understand?

24 A. Yes.

25 Q. We are here together for facts

1 Jory Baron

2 and not speculation. If you don't know an
3 answer to a question, say so; do you
4 understand that?

5 A. Yes.

6 Q. Do you understand that you have
7 taken an oath to tell the truth today?

8 A. Yes.

9 Q. Do you understand that the oath
10 that you have taken to tell the truth
11 carries the same force and effect as if you
12 were testifying in Court before a Judge?

13 A. Yes.

14 Q. Are you currently taking any
15 medications that could prevent you from
16 recalling the truth or testifying truthfully
17 today?

18 A. No.

19 Q. How about any physical or
20 emotional conditions, are you currently
21 under any condition that could prevent you
22 from recalling the truth or testifying
23 truthfully and completely today?

24 A. No.

25 Q. Besides your attorney, have you

1 Jory Baron

2 spoken with anyone to prepare for today's
3 deposition?

4 A. No.

5 Q. Without telling me the contents
6 of your communications with your attorney,
7 did you, yes or no, talk to your attorney to
8 prepare for this deposition?

9 A. Yes.

10 Q. Again, without telling me the
11 contents of the communications, for how long
12 did you speak with your attorney?

13 A. A few hours.

14 Q. In preparation for today's
15 deposition, did you review any documents?

16 A. Yes.

17 Q. What were those documents?

18 A. All the documents that were
19 provided to me, the allegations set forth in
20 the case, the Interrogatories and other
21 documents that I signed.

22 Q. Mr. Baron, what is your full
23 name?

24 A. Jory Philip Baron.

25 Q. How do you spell Philip?

1 Jory Baron

2 A. P-H-I-L-I-P.

3 Q. Since this is a virtual
4 deposition, when you are on break, do you
5 affirm that you are not going to communicate
6 by email, chat, or instant message on your
7 phone or any other device?

8 A. No.

9 MR. KATAEV: Let the
10 record reflect that there is
11 no such device before him.

12 Q. Do you agree that besides the
13 documents that I will be showing you on the
14 screen as exhibits today that you will not
15 be reviewing any notes on your computer,
16 cell phone or your notepad?

17 A. Yes.

18 MR. KATAEV: Same notation
19 for the record.

20 Q. Have you ever been arrested
21 before?

22 A. No.

23 Q. Have you ever been a party to a
24 lawsuit besides this one in a State Court
25 Action?

1 Jory Baron

2 A. No.

3 Q. During this deposition, I'm
4 going to be referring to 161-10 Hillside
5 Auto which is at 161-10 Hillside Avenue as
6 Hillside Auto Outlet; do you understand
7 that?

8 MR. KATAEV: Objection to
9 the form. The corporate
10 entity is 161-10 Hillside
11 Auto Ave. It is Auto Avenue,
12 LLC d/b/a Hillside Auto
13 Outlet. You can answer the
14 question.

15 A. Yes.

16 Q. I'm going to be referring to
17 Hillside Auto Mall, Inc. as Hillside Auto
18 Mall; do you understand?

19 A. Yes.

20 Q. Do you own the residence that
21 you gave at the beginning of this deposition
22 today?

23 MR. KATAEV: Objection to
24 relevance. You can answer.

25 A. Yes.

1 Jory Baron

2 Q. In the past five years, have you
3 lived anywhere else?

4 A. Yes.

5 Q. Starting from the most recent,
6 where have you lived prior to your current
7 address?

8 A. 35 Woodland W-O-O-D-L-A-N-D
9 Street in Huntington.

10 Q. Besides the 35 Woodland Street
11 address, have you lived anywhere else in
12 addition to the address that you gave at the
13 beginning of this deposition within the past
14 5 years?

15 A. No.

16 Q. What is your highest level of
17 education?

18 A. College.

19 MR. KATAEV: Objection to
20 that.

21 A. (Continuing) Business
22 Management, Bachelor's of Science.

23 Q. What school did you attend?

24 A. Michigan and then Hofstra
25 University.

1 Jory Baron

2 Q. Are you familiar with the
3 company 161-10 Hillside Auto Avenue LLC.?

4 A. Yes.

5 Q. How are you familiar with it?

6 A. I am a member/shareholder.

7 Q. What is the percentage of shares
8 that you own?

9 A. I am a 25 percent.

10 Q. Do you recall when you began as
11 a member, the year and the month?

12 A. I don't recall specifically, but
13 it was from the beginning of the business
14 when we opened.

15 Q. How about do you recall when the
16 business opened?

17 A. Approximately 5 years ago.

18 Q. What is your role as the
19 member/shareholder at 161-10 Hillside Auto
20 Avenue LLC?

21 A. My role is very minimal; I sign
22 checks and speak to Ishaque on a weekly
23 basis just to review where we are in the
24 month.

25 Q. When you had the conversations

1 Jory Baron

2 with Ishaque on a weekly basis, would that
3 be you and Isaac only or was it you,
4 Ishaque, and someone else?

5 A. Typically, Ishaque and myself.

6 MR. KATAEV: Let the
7 attorney finish her question.

8 THE WITNESS: I apologize.

9 MR. KATAEV: It's to make
10 the court reporter's life
11 easier.

12 Q. When you say that you spoke to
13 Ishaque on a weekly basis, just to review,
14 on a weekly basis, can you describe what
15 kind of information you and Ishaque
16 exchanged during those conversations?

17 MR. KATAEV: Objection as
18 to relevance. You can answer.

19 A. It could vary on a weekly basis.
20 Sometimes it could be how many vehicles do
21 we have currently sold for the month? How
22 was our cash position? Certain general
23 questions just to get a general sense of the
24 health of the dealership at the moment.

25 Q. Do you still have those weekly

1 Jory Baron

2 meetings with Ishaque currently?

3 A. It can vary. I can come in
4 weekly, it could be every other week or as-
5 needed.

6 Q. Let's start from the car sales,
7 did you discuss with Ishaque the number of
8 vehicles sold at Hillside Auto Outlet in
9 2018/2019?

10 A. On a monthly basis, yes.

11 Q. In 2018/2019, do you recall how
12 many cars were sold by the dealership on a
13 monthly basis?

14 A. I cannot recall.

15 Q. Can you give us a range?

16 A. I would be guessing from 5 years
17 ago, but I would prefer not to.

18 Q. Was the number of vehicles sold
19 in 2018 and 2019 more or less than the
20 number of vehicles sold on a monthly basis
21 currently?

22 A. Again, unfortunately I cannot
23 recall every month, it varied.

24 Q. How about the revenue generated
25 by the deals on a monthly basis, do you

1 Jory Baron

2 recall that in 2018 and 2019, again, on a
3 monthly basis?

4 A. I cannot recall.

5 MR. KATAEV: Objection to
6 that one.

7 Q. During those meetings, would you
8 ever discuss issues that may arise on the
9 human resources front?

10 MR. KATAEV: Objection to
11 the form. You can answer.

12 A. No, that was not my position as
13 a shareholder at that time.

14 Q. When you say ``at that time`` does
15 that mean in 2018 and 2019?

16 A. Yes.

17 Q. What is your position as a
18 shareholder currently, and I mean regarding
19 perhaps human resources discussed with you
20 currently?

21 A. Ishaque handles the day-to-day
22 of the human resources aspect. If I need to
23 get involved, he will call.

24 Q. When was the most recent time
25 when he called you with respect to a human

1 Jory Baron

2 resources issue?

3 A. None.

4 MS. TROY: Emmanuel, can
5 you do me a favor? You
6 usually project pretty well,
7 but if you don't mind moving
8 the microphone closer to the
9 witness.

10 MR. KATAEV: How is it
11 now?

12 MS. TROY: No problem.

13 MR. KATAEV: So the record
14 is clear, there is a shared
15 microphone on the table and
16 we just moved it closer to
17 the witness so that it is
18 clear.

19 MS. TROY: I believe the
20 witness said ``none.'' We can
21 move on.

22 MR. KATAEV: That is
23 correct.

24 Q. From the beginning of the time
25 when you became the shareholder at Hillside

1 Jory Baron

2 Auto Outlet five years ago until the present
3 day, has there ever been an occasion when
4 Ishaque called you regarding a human
5 resource issue?

6 A. No.

7 Q. Back in 2018 and 2019 what would
8 be a number of cars sold on a good month?

9 A. I can't give you a specific
10 number.

11 Q. What would be the number?

12 MR. KATAEV: Objection.

13 Asked and answered for that
14 one.

15 Q. How about in a slow month?

16 A. I cannot recall, i can't give
17 you a specific answer.

18 Q. Do you recall if there were
19 months or seasons when the car sales would
20 be slower?

21 A. Yes. The car sales can vary
22 from month-to-month depending on the time of
23 year and other factors.

24 Q. What other factors would car
25 sales would depend on?

1 Jory Baron

2 A. It could be holiday times,
3 certain promotions, people know that deals
4 would be going on at the end of the year,
5 different things like that, weather, tax
6 returns, so on and so forth.

7 Q. Let's go to holiday times, what
8 were the major holidays that would affect
9 car sales, and we are still talking about
10 Hillside Auto Outlet?

11 A. Everything within the industry
12 can typically run hand-in-hand. It would be
13 Memorial Day, President's Week, the end of
14 the year, vice-a-versa, major holidays can
15 adversely affect business. Mother's Day,
16 Easter, Christmas. They tend to be slow,
17 but again, it could vary.

18 Q. What are the busier months at
19 Hillside Auto Outlet?

20 A. I cannot recall what would be
21 the busiest months.

22 Q. Are you familiar with Ishaque
23 Thanwalla?

24 A. Yes.

25 Q. How are you familiar with him?

1 Jory Baron

2 A. He is a partner of mine.

3 Q. What is his role and exact title
4 at Hillside Auto Outlet?

5 A. To manage day-to-day aspects of
6 the dealership throughout.

7 Q. Is it fair to say that he has
8 the power to hire employees?

9 A. Yes.

10 Q. How about firing?

11 A. Yes.

12 Q. How about setting their
13 schedule?

14 A. Yes.

15 Q. How about setting their pay?

16 A. Yes.

17 Q. To your knowledge, what was the
18 work schedule at Hillside Auto Outlet in
19 2018/2019?

20 A. I don't know.

21 Q. How about the store hours, what
22 were the store hours at Hillside Auto Outlet
23 in 2018/2019?

24 A. I cannot recall.

25 Q. Do you, as a shareholder, have

1 Jory Baron

2 the power to hire employees?

3 A. That is not my role.

4 Q. Please listen carefully to the
5 question. The question is: do you have the
6 power or authority to hire employees?

7 MR. KATAEV: Objection.

8 Asked and answered, but you
9 can answer the question
10 again.

11 A. Again, it is not my role.

12 Ishaque is in charge of that aspect.

13 Q. Do you have the power to --

14 MR. KATAEV: Objection.

15 Asked and answered.

16 MS. TROY: Mr. Kataev, if
17 you listened carefully, he
18 did not actually answer the
19 question which is why I am
20 asking the question again.
21 The question is ``yes or no,
22 do you have the authority to
23 hire employees?''

24 MR. KATAEV: My objection
25 stands, and you can answer

1 Jory Baron

2 the question again.

3 A. That's Ishaque's role and I
4 don't have that power to do that.

5 Q. How about to fire employees?

6 A. No, that is Ishaque's
7 responsibility.

8 Q. How about setting the schedule?

9 A. No, that is not my
10 responsibility.

11 Q. How about setting the pay?

12 A. That was not my responsibility.

13 Q. Do you know the payment
14 structure for the car salespeople at
15 Hillside Auto Outlet?

16 A. No.

17 Q. During the discussions about the
18 cash positions, and by discussions, I mean
19 discussions with Ishaque, did the cash
20 position involve payroll expenses?

21 MR. KATAEV: Objection.

22 Vague, but you can answer.

23 A. No.

24 Q. When you talked about the cash
25 positions, what was being discussed

1 Jory Baron

2 specifically?

3 MR. KATAEV: Objection to
4 relevance. You can answer.

5 A. The amount of money needed to
6 operate a business successfully; just making
7 sure that again, there was enough money for
8 floor plans and different things like that.

9 Q. When you discussed the cash
10 position, would you discuss the income as
11 well as the expenses?

12 A. Can you repeat the question,
13 please?

14 MS. TROY: Sure. Let's
15 strike that last question.

16 Q. During your discussions with
17 Ishaque, would you discuss the payroll
18 expenses at all?

19 A. No.

20 Q. Would he ever discuss with you
21 how much he was paying either a specific
22 employee who was working for Hillside Auto
23 Outlet or a certain position, for instance,
24 a car salesperson?

25 A. No.

1 Jory Baron

2 Q. During all of your time as a
3 shareholder at Hillside Auto Outlet, have
4 you ever hired anyone?

5 A. I have trouble hearing you. I'm
6 so sorry. If you could just repeat that one
7 more time.

8 Q. Have you ever hired anyone on
9 behalf of Hillside Auto Outlet?

10 A. No.

11 Q. How about firing people?

12 A. No.

13 Q. Besides 161-10 Hillside Auto
14 Avenue LLC, do you own any other company's?

15 A. No. Oh, I apologize. We do
16 have Hillside Auto Outlet 2 that is down the
17 road.

18 MR. KATAEV: Do you mean
19 the numeral?

20 THE WITNESS: Yes.

21 Q. What is the address of Hillside
22 Auto Outlet 2?

23 A. 179-10, I believe. I would have
24 to double check, but I believe that is the
25 address.

1 Jory Baron

2 Q. Does Hillside Auto Outlet 2 also
3 sell cars?

4 A. We store cars there and they can
5 sell them, but it's mostly for service of
6 vehicles.

7 Q. Besides yourself, are there any
8 other shareholders of Hillside Auto Outlet
9 2?

10 A. Yes.

11 Q. Who are they?

12 MR. KATAEV: Objection as
13 to relevance. You can
14 answer.

15 A. The Estate of David Baron and
16 Josh Aaronson, as well as Ishaque.

17 Q. Is it fair to say that you each
18 have a 25 percent share?

19 A. Yes.

20 Q. Turning your attention back to
21 Hillside Auto Outlet, is it fair to say that
22 you and Josh Aaronson and the Estate of
23 David Baron as well as Ishaque, that you
24 each own 25 percent of the shares of the
25 company?

1 Jory Baron

2 A. Yes.

3 Q. Are you familiar with Josh
4 Aaronson?

5 A. Yes.

6 Q. How are you familiar with him?

7 A. He is a business partner.

8 Q. Besides 161-10, Hillside Auto
9 Avenue, d/b/a, Hillside Auto Outlet, LLC and
10 Hillside Auto Outlet 2, are you business
11 partners with him and any other
12 corporations?

13 A. Not at the moment.

14 Q. What was his role or
15 responsibility at Hillside Auto Outlet?

16 A. Shareholder.

17 Q. As the shareholder, what did he
18 do?

19 A. I don't know.

20 MR. KATAEV: Who is ``he?``

21 MS. TROY: Josh Aaronson.

22 MR. KATAEV: Go ahead.

23 A. (Continuing) I cannot speak for
24 his responsibilities.

25 Q. Earlier you mentioned that you

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Jory Baron

had monthly back and forth in 2018 and 2019 and weekly meetings with Ishaque about everything about Hillside Auto Outlet. Would Josh Aaronson ever join the two of you at any of those meetings?

A. There were occasions where we might have been on the phone together.

Q. During those occasions, were the same types of things discussed or was it something different in those discussions?

A. It could vary.

Q. Let's turn your attention to the late David Baron for a second. At the time when the company was formed, David Baron was still alive; is that correct?

A. Yes.

Q. Let's backtrack, do you recall what year and month he passed away?

A. It would be 2 years in May.

Q. Between 2018 and 2019, what role or responsibilities did he have as the shareholder of 161-10 Hillside Auto Avenue, LLC?

A. I cannot recall, nor was I

1 Jory Baron

2 involved.

3 Q. After 2021 when, essentially the
4 Estate of David Baron was the executor for
5 the late David Baron, what, if any
6 discussions were had between or amongst the
7 shareholders regarding anything related to
8 Hillside Auto Outlet?

9 A. Can you please repeat that
10 question?

11 Q. So, sure. Sort of a similar
12 question that I had asked you with respect
13 to Josh Aaronson, but now we are talking,
14 I'm turning your attention to the Estate of
15 David Baron.

16 Did the Estate of David Baron ever
17 participate in shareholder meetings?

18 A. I cannot recall, nor do I
19 remember.

20 Q. When was the last meeting that
21 was attended either by the Estate of David
22 Baron or by the late Mr. Baron?

23 A. I cannot remember.

24 Q. Are you familiar with a company
25 called Hillside Auto Mall, Inc?

1 Jory Baron

2 A. If I may ask, familiar in what
3 way?

4 Q. Do you know of the company?

5 A. Yes.

6 Q. How do you know of the company?

7 A. They are down the block from
8 where we are.

9 Q. Were there ever occasions from
10 your perspective as a shareholder, were
11 there ever occasions when Hillside Auto
12 Outlet employees would sell cars from
13 Hillside Auto Mall?

14 A. They are 2 companies, they are 2
15 different businesses.

16 Q. Let me just turn your attention
17 and focus on the question, which was: were
18 there ever occasions when Hillside Auto
19 Outlet's employees sold cars from Hillside
20 Auto Mall?

21 MR. KATAEV: Objection.

22 Asked and answered. You can
23 answer the question.

24 A. Throughout we could have
25 vehicles brought to Hillside Auto Outlet to

1 Jory Baron

2 be shown. But, every vehicle that gets sold
3 would be a Hillside Auto Outlet vehicle.

4 They could again have the vehicle brought to
5 be shown if the customer likes it, Hillside
6 Auto Outlet, we do that with other locations
7 where they can purchase the vehicles from
8 those stores and then try to sell them.

9 Q. When you mentioned that the
10 vehicles could be brought to Hillside Auto
11 Outlet, I am going to follow-up on that and
12 ask you: were there occasions when the car
13 salespeople would bring customers down the
14 block to Hillside Auto Mall to sell cars at
15 Hillside Auto Mall?

16 A. No, not that I'm aware of.

17 Q. Are you familiar with the co-
18 defendant, Andris Guzman?

19 A. I am familiar with his name,
20 yes.

21 Q. Do you recall his position with
22 Hillside Auto Outlet?

23 A. I cannot recall.

24 Q. Do you recall if he had
25 managerial responsibilities?

1 Jory Baron

2 A. I cannot recall.

3 Q. Do you recall what the hiring
4 process was like at Hillside Auto Outlet?

5 A. That was not my responsibility,
6 so I cannot answer that.

7 Q. To your knowledge, were there
8 any posters regarding Labor Law posted
9 within the store of Hillside Auto Outlet?

10 A. Yes.

11 Q. Where were those posters posted?

12 A. I believe in the lunch area or
13 in the back area. There is a kitchen,
14 that's where the kitchen is, if I remember
15 correctly.

16 Q. Do you remember what the
17 contents on the poster was?

18 A. I cannot remember specifically.

19 Q. Do you recall if the poster was
20 there back in 2018/2019?

21 A. Yes.

22 Q. Do you recall how much in flat
23 commissions per car was given to Hillside
24 Auto Outlet employees?

25 A. It was not my responsibility.

1 Jory Baron

2 So, again, I cannot recall.

3 Q. Do you know what the bonus
4 structure was at Hillside Auto Outlet?

5 A. That was not my responsibility,
6 so I was unaware.

7 Q. Do you know if the bonus
8 structure was fixed or varied from time-to-
9 time at Hillside Auto Outlet?

10 A. Again, that was not my
11 responsibility. So, I'm unaware, I could
12 say it is not unusual for structures and
13 bonus structures to vary from time to time.

14 Q. When you said that, are you
15 speaking generally in the industry?

16 A. Yes.

17 Q. Are you familiar with the
18 plaintiff Leticia Stidhum?

19 A. Yes.

20 Q. How are you familiar with her?

21 A. I am familiar with her based on
22 this lawsuit.

23 Q. Did you know of her prior to
24 this lawsuit?

25 A. No.

1 Jory Baron

2 Q. From time to time, did you visit
3 Hillside Auto Outlet as one of the
4 shareholders?

5 A. I would visit there and it would
6 vary every so often.

7 Q. Usually what time of day would
8 you visit?

9 A. It could vary depending on my
10 schedule.

11 Q. What was the earliest time of
12 the day when you would visit the store?

13 A. After they opened, typically
14 around 10:30 in the morning would be the
15 earliest.

16 Q. How about the latest time when
17 you visited?

18 A. I would want to be out of there
19 by 2 o'clock due to traffic.

20 Q. Would you visit weekdays as well
21 as on weekend days?

22 A. Typically it would be within the
23 week.

24 Q. Meaning Monday through Friday?

25 A. Yes.

1 Jory Baron

2 Q. What was Ishaque's title at
3 Hillside Auto Outlet?

4 A. He was a shareholder/partner,
5 whichever you prefer, as well as the manager
6 of the store.

7 Q. What are the responsibilities of
8 the finance manager, and specifically we are
9 talking about Hillside Auto Outlet?

10 A. The finance manager would
11 receive credit, I should say they would
12 receive a folder from the salesperson once a
13 deal is formally agreed upon. Then, their
14 job would be to run credit and submit credit
15 to the bank and then finalize the paperwork
16 with the customers.

17 Q. To your knowledge, did any of
18 the car salespeople stay after the store
19 hours in order to finish a deal?

20 A. It is not uncommon within the
21 industry for people to have to remain past
22 our set hours to complete a deal.

23 Q. Specifically and typically, how
24 much longer would they stay past the set
25 hours to complete a deal after hours?

1 Jory Baron

2 A. I cannot tell you that. It
3 varied.

4 Q. Can you give me a range?

5 MR. KATAEV: Objection.

6 Asked and answered. You can
7 answer the question.

8 A. It completely varied.

9 Q. Are you familiar with the
10 Dealertrack system?

11 A. Yes.

12 Q. Can you explain what that system
13 is?

14 A. This is the system, this is our
15 dealer management system. I call it like
16 the brain function of the store. It is the
17 database that we use to operate the
18 dealership, they use the main database.

19 Q. To your knowledge, were any
20 records kept for employee hours, and let's
21 start from the time clock; are you aware if
22 there was a time clock at Hillside Auto
23 Outlet?

24 A. Not that I know specifically.

25 Q. How about any written records

1 Jory Baron

2 about employee's attendance?

3 A. That is not my responsibility
4 and I cannot answer that.

5 THE WITNESS: Is it okay
6 if I have a sip of my
7 Gatorade?

8 MS. TROY: Okay. For the
9 record, you don't have to ask
10 for a drink.

11 THE WITNESS: I just
12 wanted to make sure.

13 Q. How about a record of the
14 employee's pay; what records, if any, were
15 kept?

16 A. That was not my responsibility
17 and I cannot recall.

18 Q. Earlier you mentioned that you
19 learned of Leticia Stidhum through a
20 lawsuit. Prior to this lawsuit, did you
21 have any communications with Ishaque about
22 Leticia?

23 A. So, to clarify then the first
24 knowledge of this lawsuit was a text message
25 that I received from Leticia. That was the

1 Jory Baron

2 first contact that I had with her. But, no,
3 I did not have any conversations with
4 Ishaque about Leticia prior to any of the
5 legal ---

6 Q. Did you have conversations with
7 anyone about Leticia prior to this lawsuit?

8 A. Just to clarify, when you say
9 ``prior to this lawsuit,`` upon receiving a
10 text message from her, that is when the
11 conversations began about the matter that
12 day. We did not have conversations until
13 this lawsuit began.

14 Q. To backtrack for a second, the
15 text message that you were referring to, was
16 that the text message that you received from
17 Leticia?

18 A. Yes.

19 MR. KATAEV: Let the
20 record reflect that I
21 produced this morning those
22 text messages.

23 Q. Were those the text messages
24 from January 24th?

25 A. That is correct.

1 Jory Baron

2 MS. TROY: Let the record
3 reflect that D1905 to D1907,
4 I have however, it appears to
5 me that the text message was
6 cut off. And that there is
7 another page. This does not
8 represent the entirety of the
9 text messages. But, there is
10 a message that was cut off.

11 Emanuel, are you going to
12 produce the full text
13 messages?

14 MR. KATAEV: I'm sorry for
15 this. If we have them, we
16 will produce it. Please make
17 a formal demand. For what
18 it's worth, in my review with
19 the client, we believe that
20 the bottom portion of the
21 text message either says
22 ``thank you for your time'' or
23 ``thank you for your help.''
24 It was one of those two
25 things based on the client's

1 Jory Baron

2 recollection.

3 I believe we can also
4 represent and confirm, and
5 it's accurate that we can
6 also represent that there are
7 no further text messages
8 after that one; correct?

9 THE WITNESS: That is
10 correct.

11 Q. Let me just backtrack for a
12 second. I will show it on the screen and
13 maybe that will be easier. Just give me one
14 second.

15 I believe it's going to be easier if we
16 just use this same folder and we're just
17 going to name it as the next number.

18 MR. KATAEV: That is fine.
19 But, when you say ``folder,``
20 what do you mean?

21 MS. TROY: We're going to
22 mark this as Exhibit 14.
23 (Plaintiff's Exhibit 14
24 marked for identification)

25 Q. So, I'm going to show you what

1 Jory Baron

2 we have just marked as Plaintiff's Exhibit

3 14, which is also D1905 to D1907.

4 First, what is your cell phone number?

5 MR. KATAEV: Objection as

6 to relevance. You can

7 answer.

8 A. 516 840-2524.

9 Q. Since when have you used this
10 number?

11 A. I can't remember the specifics,
12 but several years.

13 Q. Is it fair to say that in 2019
14 you used the number, you were using this
15 number?

16 A. Yes.

17 Q. How did you obtain this text
18 message that I'm showing you on the screen
19 today?

20 A. Leticia texted me.

21 Q. How did you obtain this
22 screenshot of the text message?

23 A. I screenshot it.

24 Q. When did you screenshot it?

25 A. Upon the allegations brought

1 Jory Baron

2 forth, I thought that it may be relevant and
3 I went through my history of conversations.
4 I then screenshotted the text message.

5 Q. Are you saying that you
6 screenshotted it back in 2019?

7 A. No, I screenshotted it --
8 honestly, whenever the lawsuit came forth,
9 but I cannot say whether it was 2019 or not.

10 Q. You did not screenshot that this
11 year or last year, but it was sometime
12 prior; correct?

13 A. I cannot recall. Again,
14 whenever the lawsuit was brought forth and
15 it was shortly thereafter.

16 Q. Do you still use that 516 840-
17 2524 number today?

18 A. I do.

19 Q. Do you still have text messages
20 on your phone today?

21 A. I would have to go back and I
22 don't know if my text messages are now set
23 to delete after a certain time period. So,
24 I cannot answer. I may have changed it
25 during the pandemic, the cell phone was

1 Jory Baron

2 constantly being used. I may have changed
3 the setting in terms of how long my text
4 messages were kept.

5 Q. In other words, you use the same
6 number, and you had those text messages
7 before, but you are not sure if you have it
8 currently because the setting was changed to
9 possibly delete them after a certain period
10 of time?

11 A. That is correct, I would have to
12 check.

13 Q. When did you provide those
14 screenshots?

15 A. I produced those screenshots again
16 shortly after the allegations.

17 MR. KATAEV: Objection.

18 Asked and answered.

19 Q. I am now showing you the third
20 page of D1907. Do you recall what, if
21 anything, followed the last text message
22 that appears to be cut off?

23 A. From what I was told, I
24 confidentially received the text messages
25 and I took those text messages very

1 Jory Baron

2 seriously and had a conversation with
3 Leticia about everything. I told her that I
4 had to speak with Ishaque to discuss it, and
5 in fact if she was owed anything, if she was
6 owed anything, she would indeed get paid.
7 It showed that she quit, and I wanted to
8 discuss if any money to the penny was owed
9 as well as that was the complaint in the
10 text message.

11 I did then reach out to her again, and,
12 and she was unable to take my call as you
13 can see, she was at work. I reached out
14 about my availability for the text message
15 and then said to her, sent her a text
16 message and she said, ``Nevermind. I plan to
17 go a different route.``

18 So, the answer that I promised to call
19 her on the 28th is in fact incorrect as seen
20 based on this message. There was no contact
21 after this text message and no promise of
22 it.

23 Q. Let's backtrack for a second.
24 When you said that you took the text message
25 ``very seriously,`` can you take us and walk

1 Jory Baron

2 us through what specifically the steps were
3 that were taken after you received this text
4 message?

5 A. In regard to the first text
6 message, to clarify?

7 Q. Right. You were talking about
8 how you took it very seriously, et cetera.
9 Please walk us back to the first page after
10 you received this text message dated January
11 24th, which continues onto the second page.

12 A. Yes.

13 Q. What did you do?

14 A. I called Leticia and I wanted to
15 speak to her to see what she had to say. I
16 told her that I would have to speak with
17 Ishaque again, because I am not there
18 consistently, and the responsibility, again
19 it does not fall within my responsibility.
20 I had to find out from him in fact, if any
21 monies and so on and so forth was owed. It
22 is not my practice to withhold money from
23 people, and indeed if it was owed to them.
24 Again, long story short, I just wanted to
25 speak to her and get her side and verify

1 Jory Baron

2 with Ishaque.

3 Q. When did you call her?

4 A. So, I called her, I would say
5 almost immediately after this text message.
6 Shortly after the time stamp on this, and
7 then after speaking with her, I immediately
8 spoke with Ishaque. Then, as seen by the
9 text, I tried to call her back, and I guess
10 going back an hour or so after our initial
11 conversation in which she then -- you can
12 see her response.

13 Q. So, after you read the text
14 message, you did not text her back, instead
15 you called her; is that correct?

16 A. Yes. It is much easier to speak
17 over-the-phone.

18 Q. Then, can you walk through with
19 me exactly what transpired during the
20 conversation; in other words, who spoke
21 first, who said what to whom and what was
22 said in response?

23 A. So, the summary, I cannot recall
24 who spoke first except for the niceties of
25 ``hi, how are you? I am Jory, I am Jory

1 Jory Baron

2 Baron. ''

3 Again, I had not spoken or met her
4 prior. After the niceties are exchanged,
5 there was just an exchange of information in
6 terms of what was going on, what happened
7 ''let me try to get to the bottom of it and I
8 will speak to Ishaque to again see his side
9 of the case, to see if indeed the
10 allegations were correct that were brought
11 forth in her text

12 Again, upon hanging up the phone on that
13 conversation, I would have looked into it
14 and called her back and I spoke to Ishaque,
15 and I did team call her back.

16 Q. Let's backtrack for a second.
17 What did she say to you during that
18 telephone conversation?

19 A. That she had quit and they just
20 wanted to make sure if she got the pay for
21 the deals that she believes she was
22 potentially owed on. That her reason for
23 quitting was due to her pay.

24 Q. Did she say anything else to you
25 besides what you have already mentioned?

1 Jory Baron

2 A. Anything else?

3 Q. Yes, during that telephone
4 conversation.

5 A. In regard to anything else
6 pertaining to the above text, I can't recall
7 any other niceties or former exchanges.

8 Q. During that conversation, you
9 said that you were going to check with
10 Ishaque. Did you at that time tell her that
11 you were going to get back to her, call her
12 back or what did you say?

13 A. Yes, I said ``I would like to
14 speak to Ishaque,`` and then I would call her
15 back.

16 Q. So, now let's turn to what
17 happened next; what happened next after you
18 hung up with Leticia, how soon thereafter
19 did you call Ishaque?

20 A. Immediately.

21 Q. Then, you called Ishaque on his
22 personal phone or did you call him on the
23 Hillside Auto number?

24 MR. KATAEV: Objection as
25 to relevance. You can answer.

1 Jory Baron

2 MS. TROY: If he knows.

3 A. Most likely it would've been on
4 his cell phone but I can't recall
5 specifically. Ishaque's cell phone, yes.

6 Q. Let's backtrack a second. The
7 516 840-2524 number, what service provider
8 did you use, and let's start from back in
9 2018/2019?

10 A. I know that the number -- the
11 carrier was Verizon and it is still Verizon.

12 Q. From 2018 until the present day,
13 has it always been Verizon?

14 A. It had been AT&T, but I don't
15 know what time I switched.

16 Q. Turning your attention back to
17 this period of time which is roughly
18 speaking from 2019 in January, were you in
19 fact using Verizon or was it AT&T?

20 A. I would again believe it was
21 Verizon. But, I cannot exactly say. I
22 can't confirm it exactly.

23 Q. When you said that you called
24 Ishaque , was it from your 516 840-2524
25 number that you called him?

1 Jory Baron

2 A. Yes.

3 Q. Just to clarify, the only
4 communications you had with Ishaque on this
5 day, which was January 24th, was by phone;
6 is that correct?

7 A. I can't recall. But, I do know
8 that I did speak with him via phone, though.

9 Q. Let's take a look at the time
10 stamp 10:56 a.m. Is that when you called
11 Ishaque?

12 A. Shortly after receiving the text
13 message and after speaking with Leticia.

14 MS. TROY: Emanuel, what
15 are you talking about with
16 your witness? I see that you
17 are mumbling something.

18 MR. KATAEV: I didn't
19 mumble anything. I told him
20 that there was a question
21 pending and to wait for the
22 question.

23 MS. TROY: If you are
24 going to talk with the
25 witness, it is going to have

1 Jory Baron

2 to be part of the record.

3 For instance, if you have any

4 directions, please just

5 project so that the court

6 reporter can write it down,

7 your direction to the witness

8 on the record. But, there

9 should not be any

10 communications between you

11 and the witness that the

12 court reporter does not take

13 down.

14 MR. KATAEV: That is fine.

15 Q. When you called Ishaque, can you
16 walk me through what was said during that
17 telephone conversation?

18 A. He had indicated as the text
19 message that was received, it indicated, and
20 he then told me that she had quit and that
21 there was no money owed to her at that
22 point. I did infer to him should we find
23 that there were any deals that we should
24 make sure that she got paid. He agreed, but
25 at that time to his knowledge, there was no

1 Jory Baron

2 money owed to her. Then, I would then
3 communicate to her after speaking with him
4 that anything that she had, that she
5 would've had to follow-up with Ishaque.
6 But, I had no role in helping resolve any
7 issues.

8 Q. What specifically did Ishaque
9 say to you besides what you have already
10 mentioned?

11 A. Nothing that I can recall
12 specifically. Again, most likely ``how are
13 you?''

14 Q. When you said that he indicated
15 with regard to the text messages that you
16 received, did you at any point whether prior
17 or after or during the telephone
18 conversation screenshot the text messages
19 and send it to Ishaque?

20 A. Not that I can recall.

21 Q. What was the conclusion at the
22 end of the telephone call between you and
23 Ishaque?

24 A. The conclusion that was most
25 likely no money was owed, but that we would

Jory Baron

look into it and do our due diligence. That I would then call Leticia back, which I did, to let her know the process that would take place. Again, she was unable to answer my phone call in which she texted me back. You can see my text message responses, and she no longer wanted to have communications with me post that last attempt.

Q. To clarify, after your one phone call with Leticia, were there any subsequent phone call conversations between you and her?

A. I had my initial phone call and I attempted to call her back. As I said, I like to try to rectify these situations and her response was even in the text message, she said, I said ``can I call you?`` and I'm paraphrasing a little bit. I don't have the text message in front of me. But, that was the last attempt to communicate with her aside from the text message saying that I would be available for about 10 minutes or the following day. Again, I never shut anyone down if they have issues that they

1 Jory Baron

2 want to try to resolve.

3 Q. Going back to telephone
4 conversations you had with Leticia, did you
5 at any point tell her to ``stop?``

6 A. To stop what?

7 Q. Did you say the word ``stop`` at
8 all during that telephone conversation?

9 A. No. Most likely not at all. I
10 like to hear everybody's point and then let
11 them speak. It's not in my nature to
12 interrupt or tell someone or tell them to
13 ``stop.``

14 Q. Did you ever tell her to ``stop
15 ranting`` during that telephone conversation?

16 A. No, I can hardly even remember
17 using the word ``rant`` in my life.

18 Q. Did you in fact pay any amount
19 that Leticia alleged that she was owed to
20 Leticia?

21 A. To the best of my ability,
22 Ishaque handled whatever monies were owed to
23 Leticia. That was to the best of my
24 understanding.

25 Q. To the best of your

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Jory Baron

understanding, after the telephone conversation between you and Ishaque, where you both sort of concluded that she was not owed any money, was any money paid to Leticia?

A. I cannot recall, nor confirm. Again, I would just like to state that I had a conversation with Ishaque to look into the matter further and let him make the decision from there.

Q. Between January 24th when you had this telephone conversation with Ishaque until January 28th, did you and Ishaque have any subsequent conversations either by phone or in-person?

A. Not recalling specifically. I cannot recall.

Q. Subsequent to the January 24th conversation between you and Ishaque that you just mentioned, when was the next conversation that you can recall between you and Ishaque about Leticia?

A. Can you please re-ask the question?

1 Jory Baron

2 Q. Sure. So, you had a
3 conversation on January 24th with Ishaque
4 about Leticia; is that correct?

5 A. That is correct.

6 Q. You said that you could not
7 recall whether subsequent conversations with
8 Ishaque took place.

9 Now, my question for you is: of the
10 conversations that you can recall, when was
11 the next conversation, the date?

12 A. I can't recall a specific date.
13 But, as my business partner, we obviously
14 did speak at some point after January 24th.

15 Q. Was that specifically about
16 Leticia?

17 A. Again, I am sure that we did
18 have a conversation. I don't know
19 specifically, but that was put into his
20 hands to handle.

21 Q. Let's backtrack for a second: do
22 you recall besides Leticia Stidhum, if there
23 were any female, any other female car
24 salespersons at Hillside Auto Outlet at the
25 time?

1 Jory Baron

2 A. I was not familiar with the
3 staff at the time. So, I can't answer that
4 properly.

5 Q. Do you know who was the top car
6 salesperson at the time at Hillside Auto
7 Outlet?

8 A. I cannot recall, nor -- I said,
9 nor was I familiar with the staff at that
10 time.

11 Q. Now, turning your attention to
12 Leticia Stidhum, how was she as a car
13 salesperson?

14 A. I cannot speak to that. Again,
15 that was not my responsibility on a daily
16 role.

17 Q. Turning your attention now to
18 again, the text message which was marked as
19 Plaintiff's Exhibit 14, to your knowledge,
20 did she sell 28 to 30 cars a month for
21 Hillside Auto Outlet?

22 A. I cannot answer that question.
23 Again, I was unaware of who sold what during
24 that time.

25 Q. How about the 5 percent on any

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Jory Baron

deal made that was over \$3,000 or \$3,500?

A. That was not my responsibility.

So, I was unaware of the pay plan.

Q. At any time during your conversations with Ishaque, did you at any point mention to Ishaque that Leticia said that she sold 20 to 30 cars a month?

A. I cannot specifically recall that, any amount of units that she said she sold.

Q. How about that she was number one for sales for a good seven to eight months?

A. Again, I cannot remember specifically her status as a salesperson; if it was just in this phone call in relation to the amount of vehicles that she sold.

Q. How about that Ishaque refused to pay her her last check that allegedly was addressed during the phone call?

A. That allegation was addressed, again, because I take these text messages seriously and I wanted to make sure that there were no issues.

1 Jory Baron

2 MR. KATAEV: Can we take a
3 break?

4 MS. TROY: We're going to
5 take a break in five minutes,
6 give or take.

7 MR. KATAEV: I have to use
8 the restroom.

9 Q. How about 5 percent on any deal,
10 did you mention this during your
11 conversation with Ishaque?

12 A. I cannot recall.

13 Q. Did you mention that Leticia was
14 pregnant during your conversation with
15 Ishaque?

16 A. I was unaware that she was until
17 the text message, and I cannot recall if
18 that was discussed.

19 Q. The question is: during the
20 telephone conversation that you had with
21 Ishaque, did you mention just Leticia's
22 paycheck or was it Leticia as well as David
23 Manrique's paycheck?

24 A. I can't recall.

25 Q. How would you describe the tone

1 Jory Baron
2 of the conversation, meaning between you and
3 Leticia; what was her tone?

4 A. I can't recall her tone.

5 MS. TROY: Emanuel, do you
6 guys want to take 5 minutes
7 or 10 minutes or we can also
8 take lunch. How much time do
9 you need?

10 MR. KATAEV: Let's come
11 back at noon.

12 MS. TROY: Let's just come
13 back at noon. And the time
14 now is 11:47.

15 We are going to try keep
16 this short, Emanuel.

17 (A recess was taken from
18 11:47 a.m. until 12:00 p.m.)

19 MR. KATAEV: We are ready
20 when you are.

21 MS. TROY: Demand Number 2
22 will be for the calls from
23 516 840-2524; the numbers
24 that were called from and
25 everything other than the

1 Jory Baron
2 calls to Leticia including
3 any representative and
4 parties of this lawsuit,
5 including Ishaque Thanwalla
6 and plaintiff Leticia Stidhum
7 can be redacted.

8 MR. KATAEV: Please
9 follow-up in writing. Thank
10 you.

11 Q. Mr. Baron, do you recall how
12 long the conversation was between you and
13 Leticia?

14 A. I cannot recall.

15 Q. Do you recall how long the
16 conversation between you and Ishaque was?

17 A. I cannot recall.

18 Q. Earlier during this deposition,
19 you mentioned that you had reviewed the
20 Interrogatories; is that correct?

21 A. That is correct.

22 Q. Did you review both the
23 Interrogatories and the Supplemental
24 Interrogatories?

25 A. Yes.

1 Jory Baron

2 Q. To the best of your knowledge,
3 is everything contained in the
4 Interrogatories and the Supplemental
5 Interrogatories; correct?

6 A. Yes.

7 Q. How about for the document
8 production responses and the supplemental
9 document responses; to your knowledge, is
10 the information contained in both of those
11 documents; correct?

12 A. Yes.

13 Q. As to the document production
14 responses as well as the supplemental
15 document production responses that had to do
16 with the actual operations, as well as the
17 employment records at Hillside Auto Outlet
18 for that type of response, to the best of
19 your knowledge, did you, yourself have any
20 personal knowledge of that?

21 A. Can you clarify or repeat the
22 question?

23 MS. TROY: Sure, Ms.

24 Luckman. If you don't mind
25 reading back the last

1 Jory Baron

2 question.

3 (The reporter read back the
4 last question)

5 A. I would be lying if I didn't say
6 that. I was confused by the question. If
7 you can repeat it one more time.

8 (The reporter read back the
9 requested question again)

10 A. (continuing) Not -- I would have
11 to guess about the legal language, but I
12 apologize. To the best of my knowledge that
13 I can recall, again, there were certain
14 things that were not my responsibility and I
15 had to trust the people that provided those
16 said documents.

17 Q. Who were the said people that
18 provided those documents; to clarify, let's
19 start with the employment records?

20 A. So, Deana at that time.

21 Q. How about documents like the
22 sales records, do you, yourself have any
23 personal knowledge about what documents
24 pertain to what response?

25 A. That was not within my realm of

1 Jory Baron

2 responsibility.

3 Q. For those responses, you
4 basically relied upon Ishaque and Deana to
5 provide the appropriate responses; is that
6 correct?

7 A. For those records, that is
8 correct.

9 Q. Are you familiar with who was
10 given access to the Dealertrack system at
11 Hillside Auto Outlets?

12 A. No.

13 Q. If I were to show you paperwork
14 from Hillside Auto Outlet car salespeople,
15 would you be able to describe the pay stub
16 for me?

17 A. I am not familiar with the pay
18 stub, just involved in relation to Hillside.

19 Q. Do you know how to read a pay
20 stub, but you don't have specific personal
21 knowledge as to how employees were paid at
22 Hillside Auto Outlet; is that correct?

23 A. Yes, that was not within the
24 realm of my responsibilities.

25 Q. Are you familiar with a person

1 Jory Baron

2 by the name of Jeanique?

3 A. I am not familiar with that
4 person.

5 Q. How many days of the week did
6 Hillside employees work?

7 A. I'm not sure of employee's
8 schedule.

9 Q. What is your birthday?

10 A. My birthday?

11 Q. Yes.

12 A. March 2nd, of 1988.

13 Q. Are you familiar with David
14 Manrique?

15 A. I can't recall.

16 Q. Do you recall when Ishaque
17 traveled to Pakistan at the end of 2018?

18 A. I can't recall.

19 Q. Do you recall if employees were
20 provided with a particular break time at
21 Hillside Auto Outlet?

22 A. I cannot speak to the day-to-day
23 operations within the store.

24 Q. What, if any, policies were in
25 place at Hillside Auto Outlet with respect

1 Jory Baron

2 to discrimination?

3 A. New York State Labor Law and all
4 of the laws had to be provided, and a poster
5 had to be provided.

6 Q. Besides the poster, were there
7 any other policies that were in place?

8 A. I cannot speak to the day-to-
9 day.

10 Q. Have you ever interviewed any
11 potential hires for Hillside Auto Outlet?

12 A. No.

13 Q. How about for Hillside Auto
14 Mall?

15 A. No. I have nothing to do with
16 that store.

17 Q. Are you familiar with an
18 employee by the name of Lily who is a DMV
19 clerk at Hillside Auto Outlet?

20 A. No, I cannot recall.

21 Q. Do you recall if said employee
22 made a complaint about losing her job
23 because she was pregnant?

24 A. That was not part of my day-to-
25 day responsibilities and I cannot speak to

1 Jory Baron

2 that.

3 Q. Do you recall if there was a
4 robbery that took place at Hillside Auto
5 Outlet?

6 A. I cannot recall.

7 Q. Earlier you mentioned that you
8 recognize the name Andris Guzman. What is
9 your knowledge as to Andres Guzman's role
10 within Hillside Auto Outlet?

11 A. I am not familiar with nor was I
12 familiar with his role within the
13 dealership.

14 Q. Understood. You don't recognize
15 his name?

16 A. I recognize it, I saw it in the
17 lawsuit.

18 Q. So, you are only recognizing his
19 name because he is part of the lawsuit; is
20 that correct?

21 A. I cannot recall his name prior.

22 Q. Are you familiar with a program
23 called VIN V-I-N Solutions?

24 A. Yes, VIN Solutions, I am
25 familiar.

1 Jory Baron

2 Q. To your knowledge, what is that
3 program?

4 A. It is a program that is
5 predominantly used in the industry.

6 MR. KATAEV: Let the
7 record reflect that the
8 plaintiff has now joined in
9 this virtual deposition by
10 and through her cell phone.
11 I'm just noting for the
12 record that the, she has just
13 come back onto the record at
14 12:13 p.m.

15 Q. What is your knowledge of VIN
16 Solutions, is it used within Hillside Auto
17 Outlet?

18 A. I'm not familiar with the day-
19 to-day usage within the store.

20 Q. Is it fair to say that VIN
21 Solutions did not log, does not log all the
22 customers because the customers would
23 include walk-in customers?

24 A. VIN Solutions is reliance on
25 certain salespeople's inputs.

1 Jory Baron

2 Q. In other words, VIN Solutions
3 required manual entries by the car
4 salespeople; is that correct?

5 A. It does require manual entries
6 by the salespeople.

7 Q. Is it accurate to say that VIN
8 Solutions typically understates the actual
9 number of cars sold?

10 MR. KATAEV: Objection to
11 the form. You can answer.

12 A. There is a discrepancy between
13 the salesperson's input and the connection
14 to the DMS. It is quite accurate for the
15 DMS. It could also vary, but it is
16 typically quite accurate due to its
17 connection with the DMS.

18 Q. What is your knowledge of
19 Leticia's performance at Hillside Auto
20 Outlet?

21 A. I'm unaware of her sales
22 performance.

23 Q. To your knowledge, was Leticia
24 ever disciplined?

25 A. I cannot recall nor speak to

1 Jory Baron

2 that.

3 Q. Do you know if she was ever
4 suspended?

5 A. Again, I was not involved in the
6 day-to-day, and I cannot speak to that.

7 Q. During your time as a
8 shareholder of Hillside Auto Outlet, were
9 employees ever given written performance
10 evaluations?

11 A. I was not responsible for the
12 day-to-day activities and I cannot speak to
13 that.

14 Q. Are you familiar with an
15 individual by the name of David Parsons?

16 A. Can you please repeat the last
17 name?

18 Q. Parsons.

19 A. I am not familiar with that
20 person.

21 Q. How about an individual by the
22 name of Sean or Shane, was he ever a car
23 salesperson who worked at Hillside Auto
24 Outlet?

25 A. No, I cannot recall any

1 Jory Baron

2 familiarity with him.

3 Q. To your knowledge, did Leticia
4 run the credit at Hillside Auto Outlet?

5 A. I cannot speak to that due to my
6 lack of role in the day-to-day
7 responsibilities.

8 Q. To your knowledge, besides the
9 January 24th phone call that you described
10 for us earlier, were there any other
11 conversations that you had with Leticia
12 subsequently?

13 A. Not as shown in the text
14 messages. She essentially -- she stated
15 that there was no further need to
16 communicate.

17 Q. Do you recall what the time was
18 for that text message, when was that text
19 message received from Leticia?

20 A. Which text message? From Leticia
21 to me or from me to Leticia?

22 Q. From her to you.

23 A. Everything took place within --

24 Q. Let me just show you so that we
25 are clear. We're going to take a lunch

1 Jory Baron
2 break shortly and I just ask you to search
3 on your phone if you still have the text
4 messages and please give it to Emanuel and
5 Emanuel will be able to provide the text
6 messages to the office. There are just some
7 questions with respect to the completeness
8 as well as other questions that are raised
9 with respect to the production in its
10 current form.

11 MR. KATAEV: Hold on, I
12 have to say something. The
13 witness will not, does not
14 have his phone with him. We
15 will ask you to follow-up in
16 a written demand and we will
17 respond.

18 Q. Mr. Baron, you don't have your
19 phone on you?

20 A. No. I did not want to be
21 distracted during today's deposition.

22 Q. Where is your phone?

23 A. It is currently at home.

24 Q. Did someone tell you to leave
25 your phone at home for today's deposition?

1 Jory Baron

2 A. I have a secondary number that I
3 use for my work purposes, for messages. So,
4 that's the phone that I typically carry.

5 Q. Let's backtrack for a second.
6 So, you said that you have two phones?

7 A. I am now stating yes, but it did
8 not come up before. I have recently gotten
9 a secondary number this year, yes.

10 Q. So, the secondary number is for
11 non-emergencies or emergencies?

12 A. No, it's not emergencies, it's
13 the work phone. So, if I need it for
14 messages or the contact with my wife. And
15 it's okay, not for contacts, just such as
16 for my wife, not customers.

17 Q. Then you also have a work phone;
18 is that correct?

19 A. Yes. I wouldn't designate my
20 work phone, but I use the 840-2524 for work
21 due to privacy.

22 Q. So, you have two phones, and one
23 is the 516 840-2524 phone? That is the
24 phone that you use to text and call Leticia,
25 and you recently obtained a non-work phone,

1 Jory Baron

2 which is basically for your family; is that
3 correct?

4 A. Yes. I was receiving calls and
5 texts at all hours of the day and it was
6 becoming quite annoying, to be honest. A
7 secondary number gives me peace.

8 Q. What you brought today is your
9 non-work phone and what you left at home was
10 your work phone?

11 A. I would not designate it as a
12 work phone, I would designate it as a second
13 number, but yes.

14 Q. When did you obtain your non-
15 work phone?

16 A. A few months ago.

17 Q. So, as to any conversations that
18 occurred via the phone with the plaintiff or
19 with any of the co-defendants with respect
20 to the present discrimination claim, the
21 pregnancy discrimination claim, that
22 would've occurred on your other phone and
23 not the phone that you brought today; is
24 that correct?

25 A. That is correct.

1 Jory Baron

2 MS. TROY: Demand number 3
3 will be for the full and
4 complete text messages
5 between Jory Baron and
6 Leticia Stidhum. The
7 timeframe will be essentially
8 from January of 2019 to the
9 present day. But,
10 specifically, we are looking
11 for any messages that may
12 have been sent or received
13 after the third page, which
14 was cut off, and produced
15 only this morning.

16 Q. Do you recall when you sent this
17 text message that is on the screen? For the
18 record, we are looking on page 3 of
19 Plaintiff's Exhibit 14. I am talking about
20 the message right after the gray message,
21 which is timestamped Thursday, January 24th
22 at 12:50 p.m. The reply, that message does
23 not have a timestamp.

24 A. So, I can only assume that it
25 was shortly after her 12:50 text.

1 Jory Baron

2 Q. How about the message that
3 happened after the gray message that begins
4 ``okay, give me a second to step out.``

5 A. I can again only assume because
6 I was only available for 10 minutes and
7 responded immediately on the same day.
8 Then, as you can see she then wrote her
9 response thereafter.

10 Q. Do you know what was the time
11 between the two gray messages?

12 A. I cannot give you specifics.
13 But, I can tell you that it was not very
14 long.

15 MS. TROY: Let's now just
16 take a quick lunch break from
17 now to what time is good for
18 everyone?

19 MR. KATAEV: We're going
20 to go outside the building.
21 It's probably going to take a
22 little bit longer.

23 Let's come back then at
24 1:15.

25 (A recess was taken from

1 Jory Baron

2 12:30 p.m. until 1:16 p.m.)

3 MS. TROY: It is now 1:16
4 and we are back on the
5 record.

6 Q. Are you familiar with an
7 individual by the name of Ali A-L-I R-A-S-K-
8 E-S-N-I-A?

9 A. To answer your question, no, I
10 am not familiar with that name.

11 Q. How about Iris Serrano, S-E-R-R-
12 A-N-O?

13 A. Iris? No, I am not familiar
14 with that name.

15 Q. Let's backtrack for a second.
16 Before the break you mentioned an individual
17 by the name of Jeanique. For context,
18 Jeanique was the manager at Hillside Auto
19 Outlet, and let me just ask you again: are
20 you familiar with that individual?

21 A. No, I'm not familiar with that
22 individual.

23 Again, sporadically again, maybe I
24 saw a face, but the name, no.

25 MS. TROY: Let's mark

1 Jory Baron

2 Plaintiffs 15.

3 (Plaintiffs Exhibit 15 marked
4 for identification.)

5 Q. I am now showing you Plaintiff's
6 Exhibit 15, a Verification.

7 A. Yes.

8 Q. Do you recognize your signature
9 on this page?

10 A. Yes, I do.

11 Q. Do you recall when you signed
12 this document?

13 A. I can't give you the exact date.
14 But, it was not too long ago.

15 MR. KATAEV: I can
16 represent for the record,
17 that it was the day that I
18 emailed to you, I think it
19 was February 3rd, Friday,
20 February 3rd I believe.

21 MS. TROY: Okay. For the
22 record, I still have not
23 received the Verification of
24 Deana Jennings and Andris
25 Guzman.

1 Jory Baron

2 MR. KATAEV: I received
3 it, I have not forwarded to
4 you and I should have
5 Guzman's, you should have it
6 on Monday. Also, maybe I
7 will stay with him today and
8 get his notarized and I'll
9 work on the others as well.

10 MS. TROY: That is fine.
11 I have no other questions for
12 you. Thank you for your
13 time.

14 THE WITNESS: No problem.

15

16 [Time noted: 1:20 p.m.]

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WITNESS	EXAMINATION BY	PAGE
Jory Baron	Ms. Troy	23

PLAINTIFF EXHIBITS

Number	Description	PAGE
EX 13	Mr. Baron's driver's license	6
(To be Deemed marked)		
EX 14	D1905 to D1907	56
EX 15	Verification	94

REQUESTS

Number	Description	PAGE
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1	MS. TROY: Demand No. 1 is,	6
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I'm going to make a demand
for Mr. Baron's driver's license.

2	MS. TROY: Demand No. 2 is,	56
---	----------------------------	----

Emanuel, are you going to
produce the full text messages?

3	MS. TROY: Demand No. 3 is,	78
---	----------------------------	----

the calls from 516 840-2524.
The numbers that were called
from and everything other
than the calls to Leticia
including any representative
and parties of this lawsuit,
including Ishaque Thanwalla
and plaintiff Leticia Stidhum
can be redacted.

4	MS. TROY: Demand No. 4 is,	92
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for the full and complete
text messages between Jory
Baron and Leticia Stidhum.
The timeframe will be

1
2 essentially from January
3 of 2019 to the present day.
4 But, specifically, we are
5 looking for any messages
6 that may have been sent or
7 received after the third page,
8 which was cut off, and produced
9 only this morning.

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QUESTIONS MARKED FOR A RULING: PAGE/LINE

(None)

ACKNOWLEDGMENT

STATE OF NEW YORK)

)s.s.

COUNTY OF SUFFOLK)

I, JORY BARON, hereby certify that
I have read the transcript of my testimony
taken under oath in my deposition of March
03, 2023; that the transcript is a true,
complete and correct record of my
testimony, and that the answers on the
record as given by me are true and correct.

JORY BARON

Signed and subscribed before me
this ____ day of _____, 2023.

Notary Public

C E R T I F I C A T E

STATE OF NEW YORK)
)s.s.
COUNTY OF NASSAU)

I, LYNN LUCKMAN, a Shorthand
Reporter and Notary Public within and for
the State of New York, do certify that;

THAT the witness whose deposition
is hereinbefore set forth, was duly sworn by
me, and that such deposition is a true
record of the testimony given by such
witness.

I further certify that I am not
related to any of the parties to this action
by blood or marriage; that I am in no way
interested in the outcome of this matter.

IN WITNESS WHEREOF, I have
hereunto set my hand this 20th day of March,
2023.

A handwritten signature in cursive script that reads "Lynn Luckman". The signature is written in black ink and is positioned above a horizontal line.

LYNN LUCKMAN

1 Errata Sheet

2

3 NAME OF CASE: LETICIA FRANCINE STIDHUM -against- 161-10 HILLSIDE AUTO AVE, LLC

4 DATE OF DEPOSITION: 03/03/2023

5 NAME OF WITNESS: JORY BARON

6 Reason Codes:

7 1. To clarify the record.

8 2. To conform to the facts.

9 3. To correct transcription errors.

10 Page ____ Line ____ Reason ____

11 From _____ to _____

12 Page ____ Line ____ Reason ____

13 From _____ to _____

14 Page ____ Line ____ Reason ____

15 From _____ to _____

16 Page ____ Line ____ Reason ____

17 From _____ to _____

18 Page ____ Line ____ Reason ____

19 From _____ to _____

20 Page ____ Line ____ Reason ____

21 From _____ to _____

22 Page ____ Line ____ Reason ____

23 From _____ to _____

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